

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA

CASE NO.3:16-CR-002

-VS-

JUDGE: ROSE

REBEKAH FAIRCHILD

MOTION FOR PERMISSION
TO TRAVEL

Now comes Rebekah Fairchild, the Defendant herein and respectfully moves this court for an order permitting her to travel beyond the borders of the Southern District of Ohio and modify the terms of her pretrial release accordingly. This request is made for the reasons set forth below.

The defendant Rebecca Fairchild wishes to visit her father, Carl Apostelos, who lives in his residence in Lagrange, Ohio. The defendant wishes to visit her father on his birthday, July 19, 2016, and return the same day. This defendant also wishes permission to be present at her father's residence with her brother Bill Apostelos, should her brother decide to visit their father on the same date. This defendant understands that she and her brother are not permitted to discuss either of their criminal cases with each other, at any time.

The undersigned counsel for the Defendant has spoken with both Mr. Tabacchi, the attorney for the government and Mr. Gover the pretrial services officer, and neither has any objections to this request.

Wherefore, defendant Rebecca Fairchild respectfully requests in order modifying the terms and conditions of her pretrial release to allow travel to Lagrange Ohio, as set forth above.

Respectfully submitted,

/s/ Michael R. Booher

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Appearance was served upon the office of the United States Attorney, the date of filing hereof by electronic filing.

/s/ Michael R. Booher
Michael R. Booher